

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Periodic Reporting
(Proposal Six)

Docket No. RM2017-10

PUBLIC REPRESENTATIVE MOTION
FOR LEAVE TO FILE A RESPONSE TO REPLY COMMENTS
SUBMITTED BY THE UNITED STATES POSTAL SERVICE

(September 26, 2017)

The Public Representative respectfully submits this motion for leave to file a response to reply comments filed by the United States Postal Service ("Postal Service") on September 22, 2017.¹ Although the Commission's rules do not permit a response as a matter of right, the Commission has the discretion to accept such a filing. See 39 C.F.R. § 3001.21(b).

This docket relates to Proposal Six and includes modifications to the Parcel Select/Parcel Return Service Mail Processing Cost Model and the Transportation Cost Model. The Public Representative submitted initial comments on September 15, 2017, which, among other things, expressed concerns regarding certain modifications included with Proposal Six. In its reply comments, the Postal Service attempted to address the Public Representative's concerns and provide some clarification. The Public Representative has evaluated the comments submitted by the Postal Service. The Public Representative respectfully requests leave to file a response to the Postal Service's comments. The Public Representative's response, which is being filed concurrently with this motion for leave as a separate docket entry, will clarify the Public Representative's current position regarding different aspects of Proposal Six.

¹ Reply Comments of the United States Postal Service Regarding Proposal Six, September 22, 2017. The Postal Service also filed concurrently a Motion of The United States Postal Service for Leave to File Reply Comments Regarding Proposal Six, September 22, 2017.

Respectfully submitted,

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